02-16-10

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

- - - - In the Matter of - - - -	)	PUC Docket No. 2008-0273
	)	
PUBLIC UTILITIES COMMISSION	)	
	)	
Instituting a Proceeding to Investigate the Implementation of Feed-in Tariffs	)	
	)	
	)	
	)	

HAWAII RENEWABLE ENERGY ALLIANCE'S

INFORMATION REQUESTS TO HECO

REGARDING

PROPOSED QUEUING AND INTERCONNECTION PROCEDURES

AND

RELIABILITY STANDARDS

AND

CERTIFICATE OF SERVICE

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I. INTRODUCTION

By its Order filed on October 24, 2008, the Hawaii Public Utility Commission ("Commission") opened the instant docket, referred to hereafter as the "FiT" docket. The Commission, by its Order filed on November 28, 2008, granted the November 13, 2008 motion of Hawaii Renewable Energy Alliance ("HREA") to intervene in the FiT docket. In accordance with the Commission's Interim Decision and Order ("D&O") filed on September 25, 2009 and its Schedule Setting Order filed on October 29, 2009, HREA hereby submits this document, constituting its Information Requests ("IRs") to HECO regarding its proposed "Queuing and Interconnection Procedures," filed with the Commission on February 1, 2010, and Feed-in "HECO Companies Report on Reliability Standards," filed with the Commission on February 8, 2010.

II. QUEUING AND INTERCONNECTION PROCEDURES

In the following IRs, the page number references are to the Merrimack Report entitled "Hawaiian Electric Company, Inc., Development of Feed-in Tariff Queuing and Interconnection Procedures and Proposal for Initial Implementation," dated February 1, 2010.

HREA-IR-1. pg. 7: regarding Interconnection Requirements Studies ("IRS") reference in the table at the bottom of the page, since HREA is now aware that IRSs are being required for residential PV projects on the Big Island, is it HECO's intent that all projects will require IRS? If not, what are the criteria for determining whether an IRS will be required? Also, will there be a fixed rate for Tier 1, Tier 2 and Tier 3 IRSs? If not, why not?

HREA-IR-2. pg. 9: regarding the application process, will all applications received be posted on HECO's web-site, including key information such as technology type, size, location and a circuit identification number? If not, why not?

HREA-IR-3. Reference the HECO presentation at the Second Technical Workshop (slide 6, Location Value Maps), is it now HECO's intent to use the Location Value Maps to indicate "high potential areas" for FiT development? If so, how would this be accomplished? For example, would the maps be published ahead of the roll-out of the FiT on each island?

HREA-IR-4. From the HECO presentation at the Second Technical Workshop (slide 7, Exhibit 3), have there been any changes to this flow chart? Specifically, in reality isn't the "IRS Required Diamond" really part of the "Queue Block?" And shouldn't there be a "breakout" of the Queue Block which indicates all of the steps required for projects to exit to the "Standard Offer Contract" block?

III. HECO COMPANIES REPORT ON RELIABILITY STANDARDS

HREA has not had enough time to digest the HECO Report entitled: "HECO Companies Report on Reliability Standards," filed with the Commission on February 8, 2010. Given that, we have a few questions for now, and we will assume that the discussion will continue as we forward in this docket and perhaps in other dockets.

HREA-IR-5. pgs. 1 and 2 of the report, not withstanding what may happen on the mainland, please define "system reliability?" For example for each grid, is system reliability the:

1. probability of maintaining a grid frequency of 60 hz ± 0.3 hz? If so, under normal operating conditions what is the probability? For example, if it is 95% what is the level of confidence that this probability is achieved? Moreover, given that there is a cost to maintain said system reliability what are the criteria for setting the grid frequency criteria, i.e., the 60 hz ± 0.3 hz or whatever it is. In HREA's opinion HECO has not be "upfront" with the Parties as to the what and why the frequency goal. Instead, all we hear is how hard it is to maintain system frequency.
2. probability of maintaining system voltage of 120 volts ± 10 volts at residents, 240 or 480 volts ± X volts at commercial or industrial customers sites? HREA believes this is an important consideration, but there has been little discussion on this by HECO.
3. probability of maintaining the load (loss of load probability? Please explain what criteria are used by HECO for "loss of load" and what the real goals are. Moreover, what measures are needed by HECO to minimize the "loss of load" probability and at what costs.
4. X or other factors in addition to the above? If so, please explain.

HREA-IR-6. pg. 2, regarding DBEDT's recommendations for the need for third-party studies of grid operations in HECO's service territory, in fact, have not such studies already been conducted within the past several years? Please identify the specific studies, who conducted them and when, and provide copies of all reports delivered to HECO.

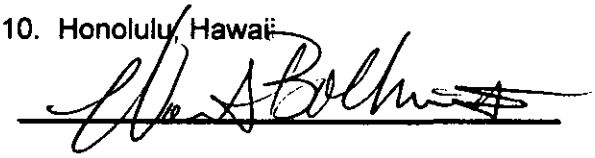
HREA-IR-7. Regarding the BEW Engineering Report which is summarized in Attachment, please provide a copy of the complete report.

HREA-IR-8. Regarding HECO's intent moving forward on Maui and the Big Island, please clarify the following regarding section E, starting on page 12 of Exhibit 1:

1. Will there be more opportunity to integrate new renewable DG at the sub-transmission or transmission level compared to distribution, or vice versa? Please explain.
2. Will HECO consider operating the grids "full-time" the way it is doing during the night-time (low load) periods, i.e., with only a minimum "must-run" generatiion? Specifically, given that PV can provide a good load match during the daytime hours, why can't more PV be allowed and back-up by the combined cycle plant at Keahole running on diesel?
3. Will HECO now advance its planning for pumped-hydro and battery storage? Please explain.
4. Is HECO willing to form one or more utility-stakeholder groups to investigate the grid operational issues in a collaborative manner?

<This concludes our IRs for now>

DATED: February 16, 2010. Honolulu, Hawaii.



CERTIFICATE OF SERVICE

The foregoing HREA IRs were served on the date of filing by Hand Delivery or electronically transmitted to each such Party as follows.

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